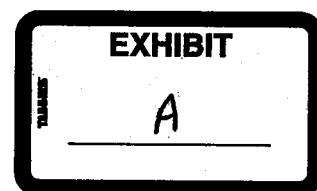


# EXHIBIT A





OK / POULTRY PARTNERS

March 17, 2005

Dear Tyson Grower,

As I'm sure you are aware, chicken litter continues to be the center of controversy with the State of Oklahoma. Settlement negotiations with the Attorney General of Oklahoma may continue, but, if not successful soon, a federal lawsuit may well be filed.

One problem with the settlement negotiations with the Oklahoma Attorney General is that growers have not been represented. Tyson has learned that the Cherokee Nation has agreed to facilitate the organization of a representative group of growers, tentatively being called Poultry Partners. Because Tyson has a duty to keep your identity confidential, we are forwarding the enclosed invitation to you, rather than giving them our list of growers and addresses.

The poultry industry supports the Cherokee Nation and Poultry Partners' efforts to help individual growers, like yourself, come together for the purpose of letting your voice be heard concerning litter issues and potentially finding other benefits for you and your family. We proudly support the growers in this effort. Growers must be a part of the team that develops a long term, sustainable solutions(s) for the complex watershed environmental issues.

The organization will represent only growers; therefore, the poultry companies will seek no influence or interference in its affairs. However, to show our general support for the concept we, and the other integrators, will be making a financial contribution to help get the organization started.

Please return the enclosed RSVP in the postage paid envelope and let Poultry Partners know if you plan to attend.

Sincerely,

A handwritten signature in cursive script, appearing to read "Archie Schaffer III".

Archie Schaffer III  
Senior Vice President, External Relations

Tyson Foods, Inc. 2210 West Oaklawn Drive Springdale, AR 72762-6999 479-290-4000 [www.tyson.com](http://www.tyson.com)

---

**From:** Schaffer, Archie  
**Sent:** Friday, October 21, 2005 8:45 PM  
**To:** Burr, Jamie (Environmental)  
**CC:** Igli, Kevin  
**Subject:** RE: Meeting with Poultry Partners and Winrock International

Jamie—

I'm not going to have time to meet and discuss unfortunately.

Please just go and listen, be non-committal and report back.

As you may know, we've been supporting Poultry Partners, contributing to getting them organized, giving money to their legal defense fund, etc.etc.

They are our friends, like the fact that the litter is theirs and want to keep it that way.

Not sure what Winrock is suggesting they might do, but I don't expect much to come of the meeting.

Appreciate your covering it for us.

arch...

Archie Schaffer III  
Senior VP, External Relations  
Tyson Foods, Inc.  
2210 Oaklawn Drive  
Springdale, AR 72762-6999

479 / 290-7232 Phone  
479 / 290-7984 Fax  
archie.schaffer@tyson.com

---

**From:** Burr, Jamie (Environmental)  
**Sent:** Friday, October 21, 2005 3:39 PM  
**To:** Schaffer, Archie  
**Subject:** FW: Meeting with Poultry Partners and Winrock International

What times do you have available the first part of next week to discuss this?

---

**From:** Patrick, Steve  
**Sent:** Monday, October 17, 2005 4:24 PM  
**To:** 'Igli, Kevin'  
**Cc:** Schaffer, Archie; Burr, Jamie (Environmental)  
**Subject:** RE: Meeting with Poultry Partners and Winrock International

Kevin/Archie

Jamie will attend this meeting on October 27th. He will contact Archie prior to the meeting to discuss any details that need to be addressed.

Thanks  
Steve

---

**From:** Igli, Kevin [mailto:kevin.igli@tyson.com]  
**Sent:** Monday, October 17, 2005 3:07 PM  
**To:** Patrick, Steve  
**Cc:** Schaffer, Archie

**Subject:** FW: Meeting with Poultry Partners and Winrock International

Can Jamie attend this? If so, cc Archie on our decision.

---

**From:** Schaffer, Archie  
**Sent:** Friday, October 14, 2005 3:14 PM  
**To:** Igli, Kevin  
**Subject:** FW: Meeting with Poultry Partners and Winrock International

I'm going to be amazed if Winrock really puts money into this, but...can you have Steve Patrick or someone attend this meeting with them?  
arch...

Archie Schaffer III  
Senior VP, External Relations  
Tyson Foods, Inc.  
2210 Oaklawn Drive  
Springdale, AR 72762-6999

479 / 290-7232 Phone  
479 / 290-7984 Fax  
archie.schaffer@tyson.com

---

**From:** Janet Wilkerson [mailto:wilkersonj@petersonfarms.com]  
**Sent:** Friday, October 14, 2005 12:30 PM  
**To:** Blake Evans; mcsimmons@simfoods.com; archie.schaffer@tyson.com; mhenderson@georgesinc.com; S McDaniel  
**Subject:** Meeting with Poultry Partners and Winrock International

Gentlemen:

The Poultry Partners group have been meeting with Winrock International for several months about funding. Bev Saunders has asked that we meet with Annette Pagan from Winrock and members of the Poultry Partners Board on Oct. 27th at 10:00 A.M. at Peterson Farms.

Winrock is very interested in providing funding for transportation of litter and would like our thoughts. Please let me know if you can attend.

Thanks,

*Janet Wilkerson,  
V.P. Human Resources*

Peterson Farms, Inc.  
250 S. Main  
Decatur, Ar. 72722

Phone: 479-752-5299  
479-752-7398  
E-Mail: Wilkersonj@Petersonfarms.com

Redacted

Redacted

-----Original Message-----

From: Bev Saunders [<mailto:sscattle2@yahoo.com>]

Sent: Thursday, March 30, 2006 10:28 AM

To: archie.schaffer@tyson.com; gary.george@georgesinc.com; gweeks@bassettlawfirm.com;  
Wilkersonj@petersonfarms.com; jelrod@cwlaw.com; jtucker@rhodesokla.com; mhenderson@georgesinc.com; S McDaniel;  
Steven\_Willardsen@cargill.com; evansb@petersonfarms.com; gmurphy@simfoods.com  
Subject: Fwd: Poultry Partners Meeting

Friends,

Attached is the March 27th letter we sent to Poultry Partners members. Please feel free to use any or all of this to communicate to your growers. Those who are not members may sign up at the door, but we will have a sign in as the information the attorney will present will be attorney/client privileged.

Contact me if you need anything else from me.

Bev Saunders

---

Talk is cheap. Use Yahoo! Messenger to make PC-to-Phone calls. Great rates starting at 1¢/min.  
<[http://us.rd.yahoo.com/mail\\_us/taglines/postman7/\\*http://us.rd.yahoo.com/evt=39666/\\*http://beta.messenger.yahoo.com](http://us.rd.yahoo.com/mail_us/taglines/postman7/*http://us.rd.yahoo.com/evt=39666/*http://beta.messenger.yahoo.com)>



Redacted

Redacted

---

**From:** Bev Saunders [mailto:sscattle2@yahoo.com]

**Sent:** Wednesday, January 25, 2006 2:40 PM

**To:** archie.schaffer@tyson.com; mcsimmons@simfoods.com; wilkersonj@petersonfarms.com;  
evanb@petersonfarms.com; russ@stfpr.com; mgraves@hallestill.com; kwilliams@hallestill.com;  
bolfarm@arbuckleonline.com; jebryan@junct.com; jhipp1055@aol.com; jhunton@co.washington.ar.us;  
keithmorgan@centurytel.net; rame\_43@yahoo.com; tmccain@lrec.org

**Subject:** Sen Coburn

Partners,

I just got off the phone with Brian Treat of Sen. Coburn's office. He said Sen. Coburn called last night and instructed his staff to pursue this issue (which is appealing to the US Attorney General that a lawsuit that puts the poultry integrators out of business or forces them to do business in another country would have a direct impact on the federal government - ie: USDA guaranteed loans). I had asked Sen. Coburn to have the US Attorney's office intervene on the government's behalf.

Brian said the staff was collecting guaranteed poultry loan numbers from Oklahoma's USDA/FSA office this morning and he is working on the initial draft of the first letter Sen. Coburn will present to get this process started. Brian assured me he will keep me/Poultry Partners advised of what is happening here and asked me to keep him alerted of any happenings or information that he or Sen. Coburn needs to know as this (hopefully) progresses forward.

I'll keep you posted.  
Bev

---

What are the most popular cars? Find out at [Yahoo! Autos](#)



---

**From:** Laurie Tilley [ltilley@littlefieldinc.com]  
**Sent:** Tuesday, January 18, 2005 10:55 PM  
**To:** James Graves (jgraves@bassetlawfirm.com); Scott McDaniel (smcdaniel@jpm-law.com); John Tucker (jtucker@rhodesokla.com); Judy Bryan (home) (jebryan@junct.com); Vicki Bronson (vbronson@cwlaw.com); thill (thill@rhodesokla.com); Ruth Ann Wisener (Ruth.Ann.Wisener@tyson.com); Archie Schaffer (archie.schaffer@tyson.com); Janet Wilkerson (wilkersonj@petersonfarms.com)  
**Subject:** Poultry Partners Meeting - Recap  
**Attachments:** Poultry Partners 2005 Budget (2).xls

Keith Morgan called a meeting on behalf of the poultry growers to further discuss the formation of the Poultry Partners. Present at the meeting on Monday, January 17<sup>th</sup> were growers Keith Morgan, Steve Bryan and Bev Saunders. Company representatives present at the meeting included Archie Schaeffer, James Smith, Janet Wilkerson, Sam LeNarz, Kerry Kinyon and Blake Evans.

The growers are requesting "seed" money so they can create materials that help legitimize the Poultry Farmers (this is the name they have landed on.) The seed money would be used to finalize a logo and create communications materials. Initial marketing communications to develop include direct mail to prospective members outlining the benefits of the Poultry Partners and encouraging them to become members. Prospective members would be growers and all entities that benefit from the industry including bankers, suppliers, insurance companies etc...

The growers also want to hire a full time individual who would be responsible for membership solicitation, communications to members, press relations, publications and presentations to the public etc...

The initial budget is \$150,000.00 (budget attached) and membership fees would be added to this budget as collected. The goal is to have as many individual growers and other business entities as possible become paying members of the group.

Next steps call for the companies to determine whether they wish to underwrite the initial investment.

Laurie Tilley  
 Littlefield Inc.  
 918.295.1045

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Laurie Tilley  
 Littlefield Inc.  
 918.295.1045

Redacted

Redacted

---

**From:** Ken Williams [mailto:KWilliams@HallEstill.com]

**Sent:** Thursday, May 18, 2006 4:24 PM

**To:** jelrod@cwlaw.com; George, Robert W.; sjantzen@ryanwhaley.com; smcdaniel@jpm-law.com;  
jtuckercourts@rhodesokla.com

**Cc:** Michael Graves; Ken Williams

**Subject:** OAG v. Tyson - Proposed Supplemental Reply for Poultry Partners

Gentlemen:

Just so that we don't step on someone else's strategy, we provide you with this advance draft of the supplemental

reply we plan to file tomorrow. Does this represent a problem to any of your clients' positions?

Thanks!

Ken

---

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**Hall, Estill**

320 S. Boston Ave.

Suite 400

Tulsa, Oklahoma 74103

(918) 594-0400

[www.hallestill.com](http://www.hallestill.com)

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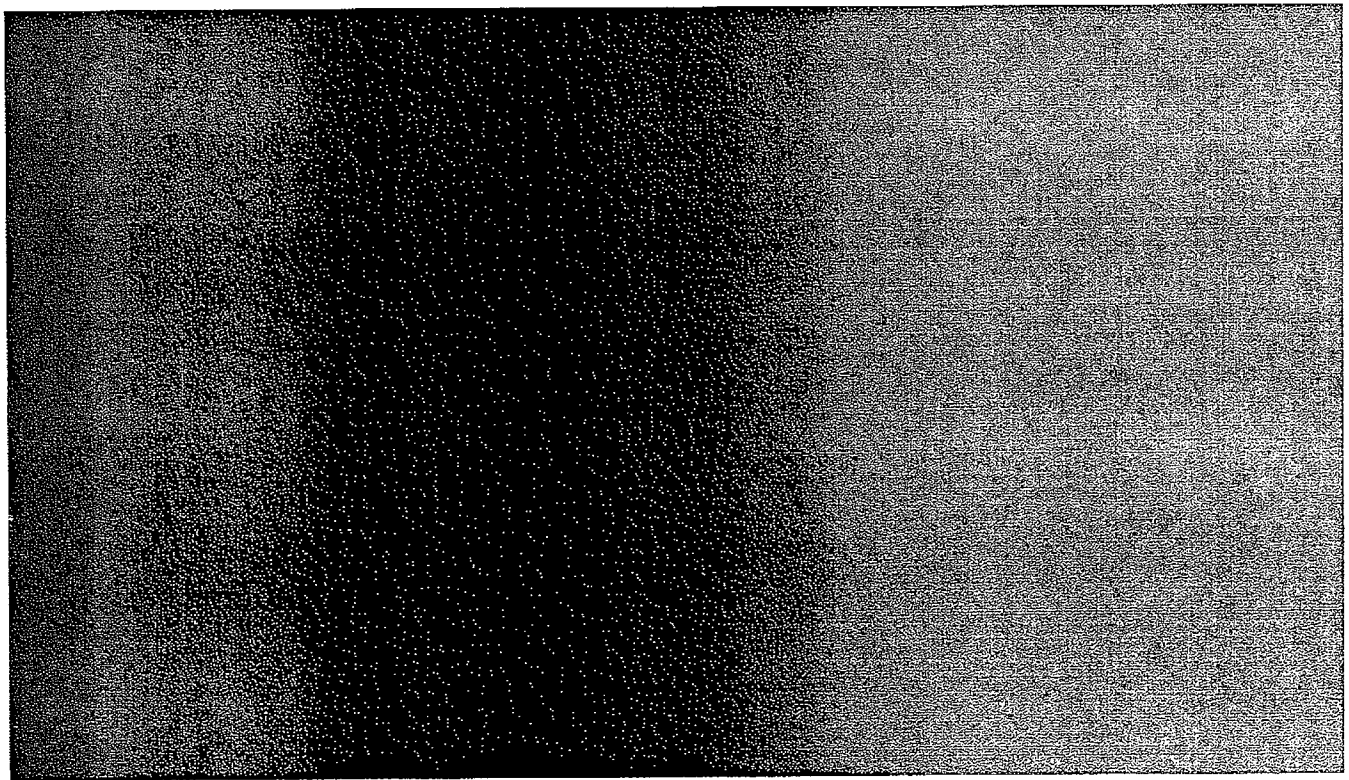
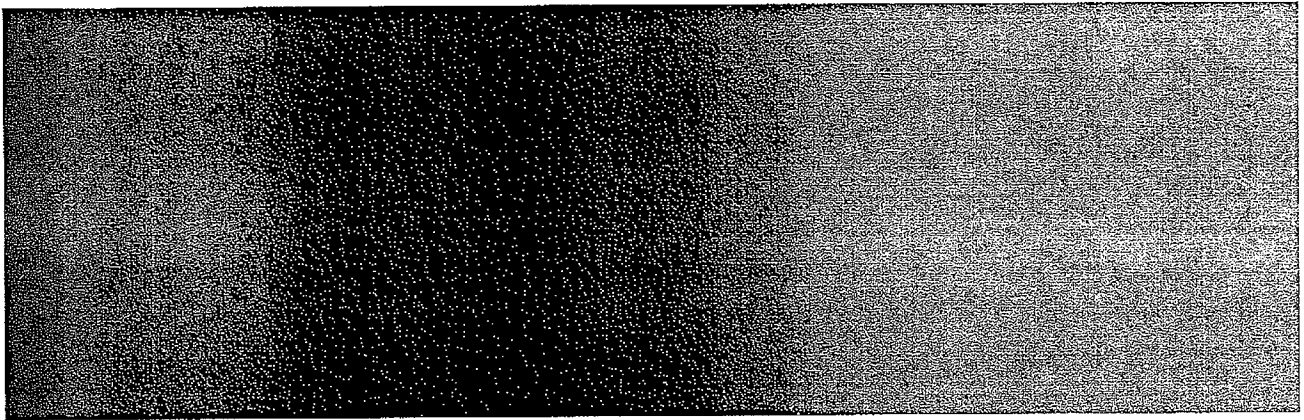
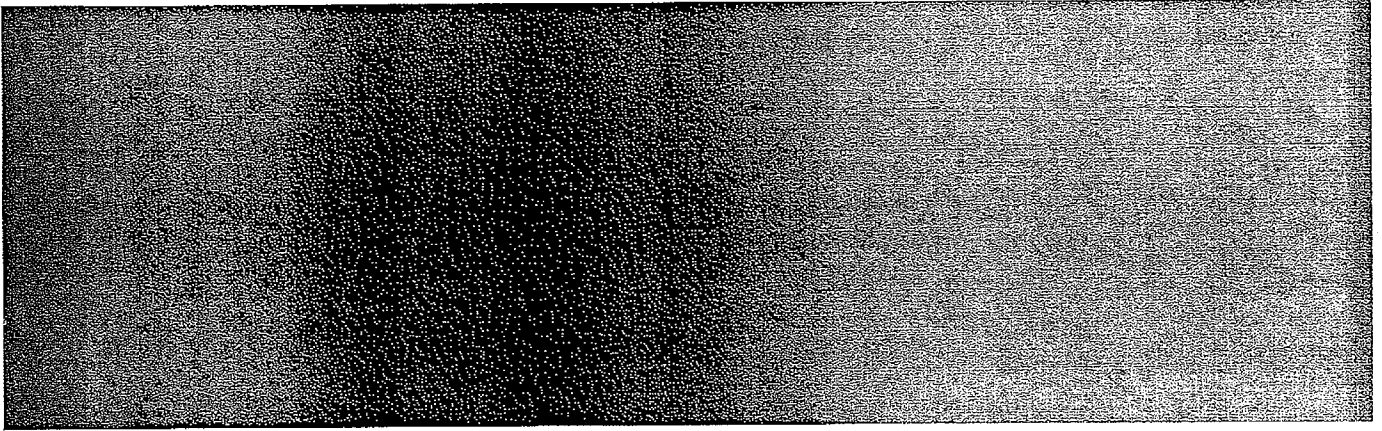
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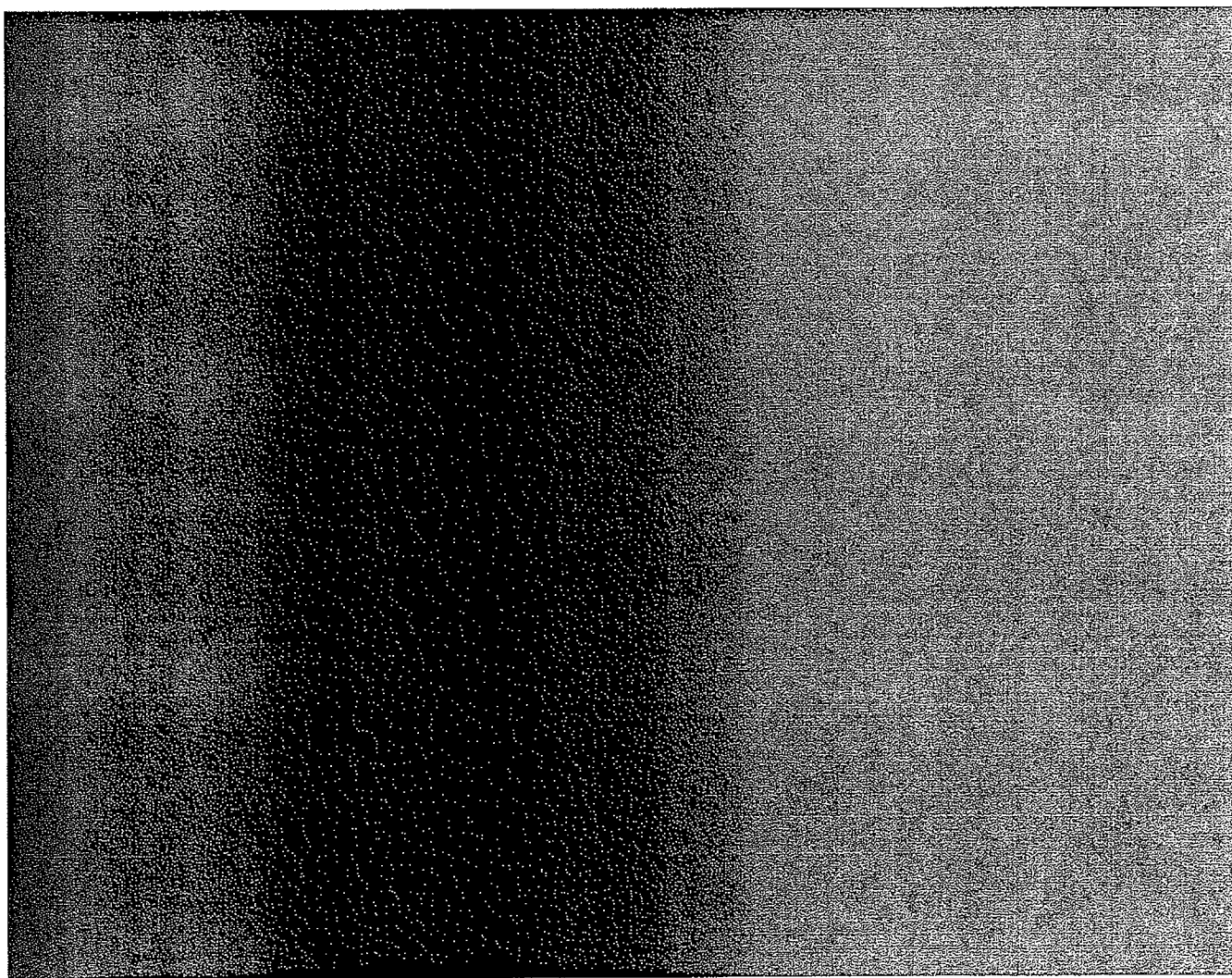
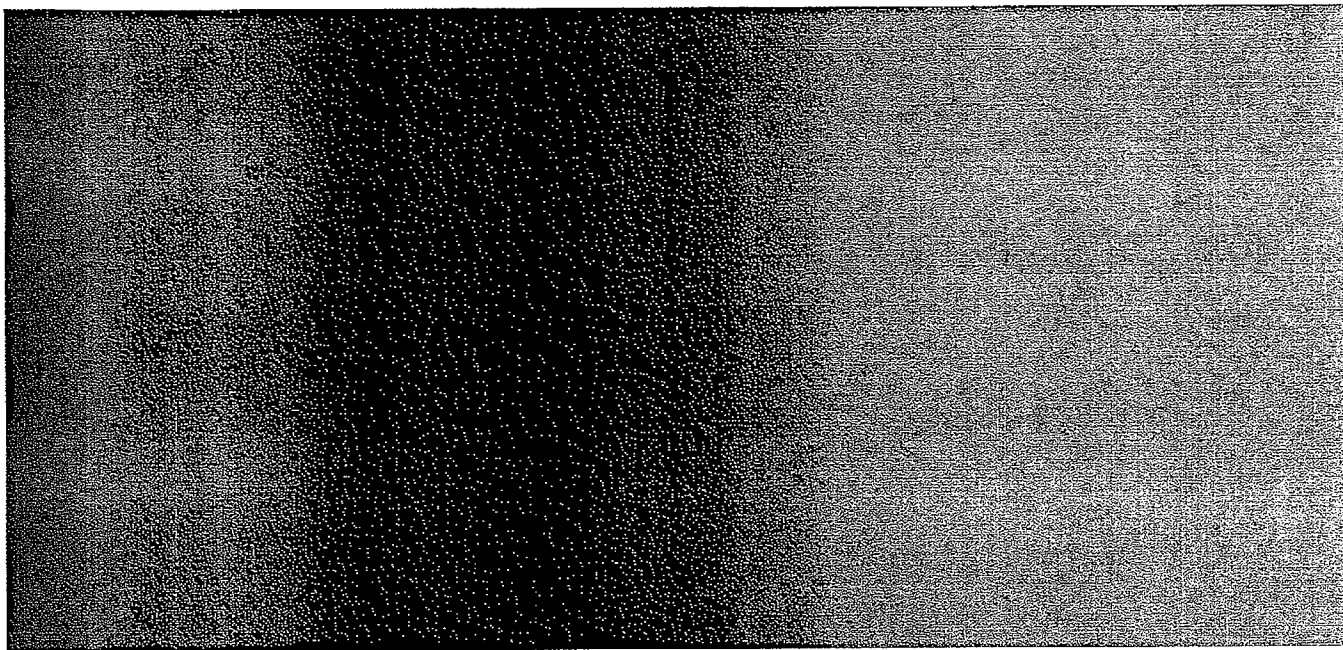
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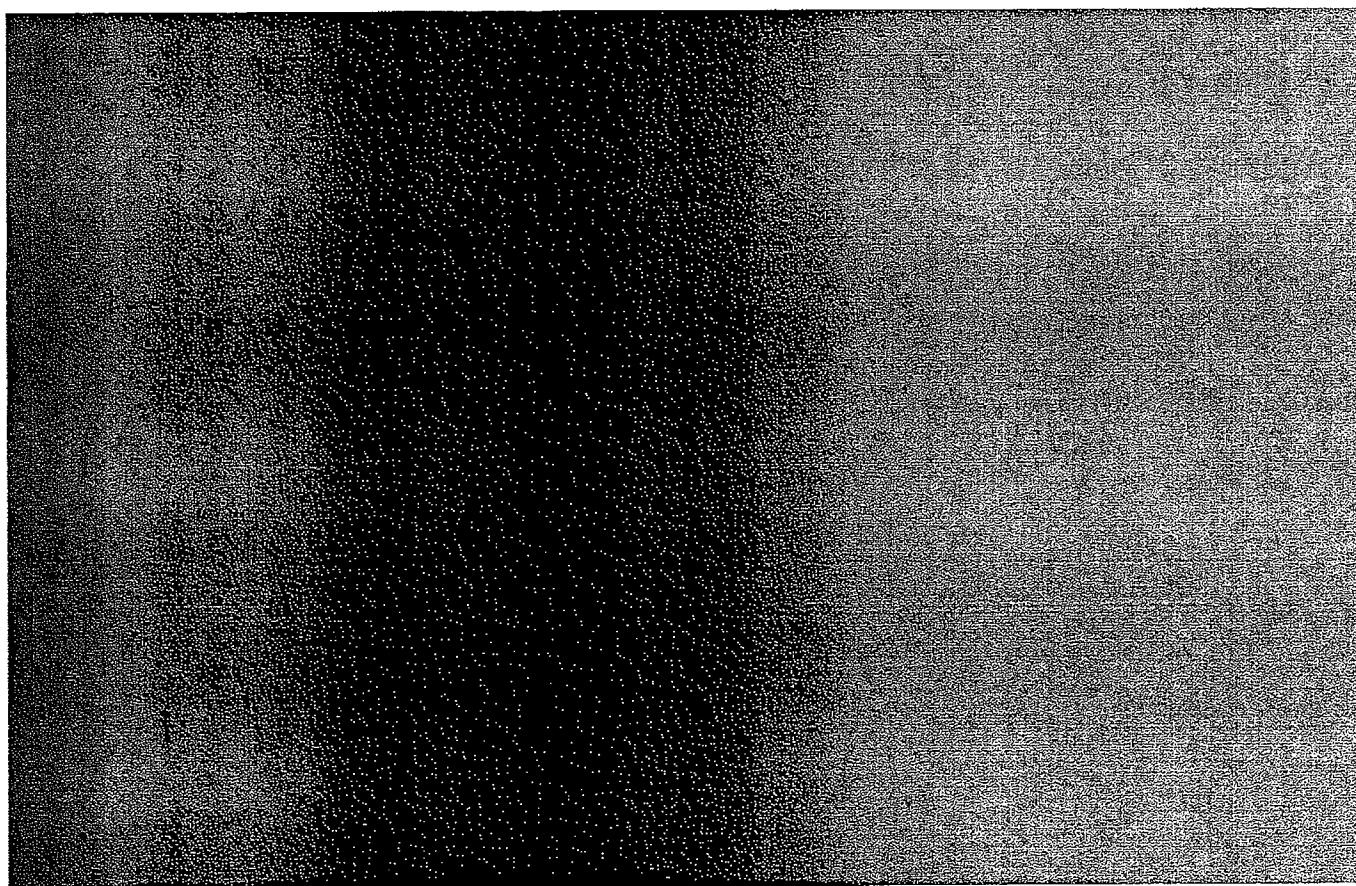
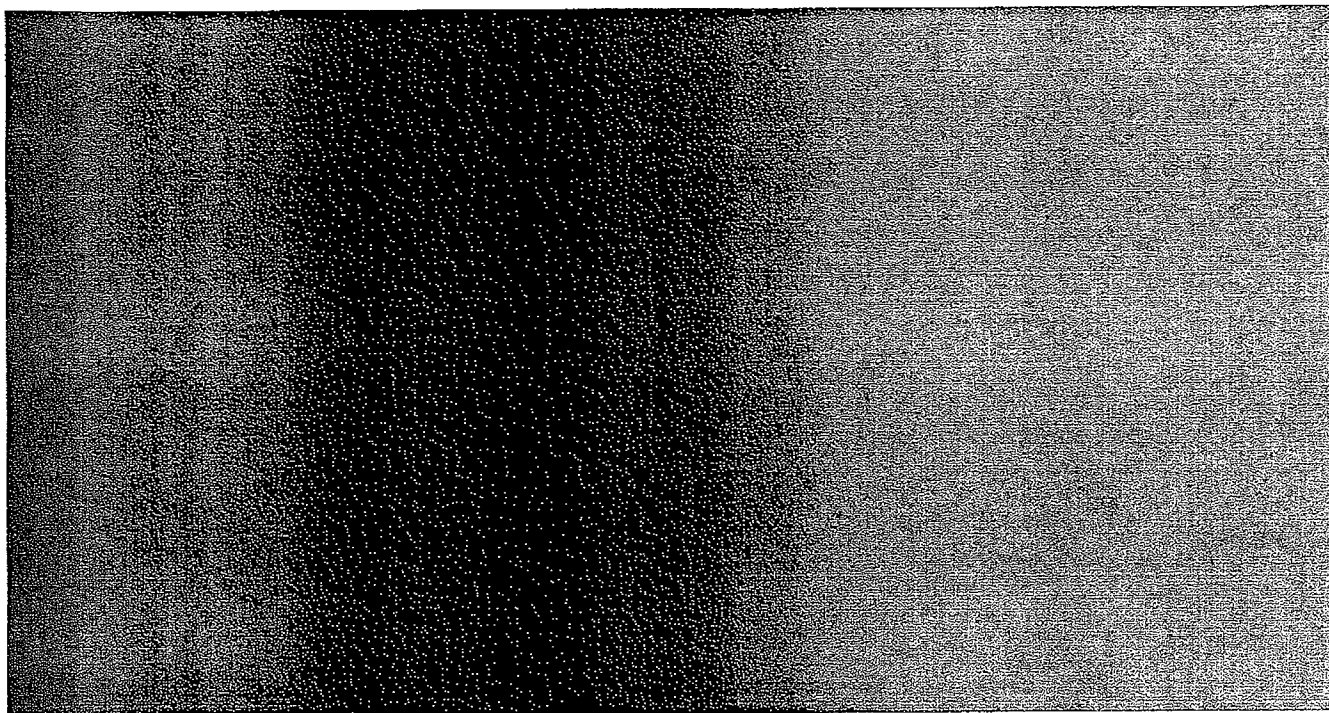




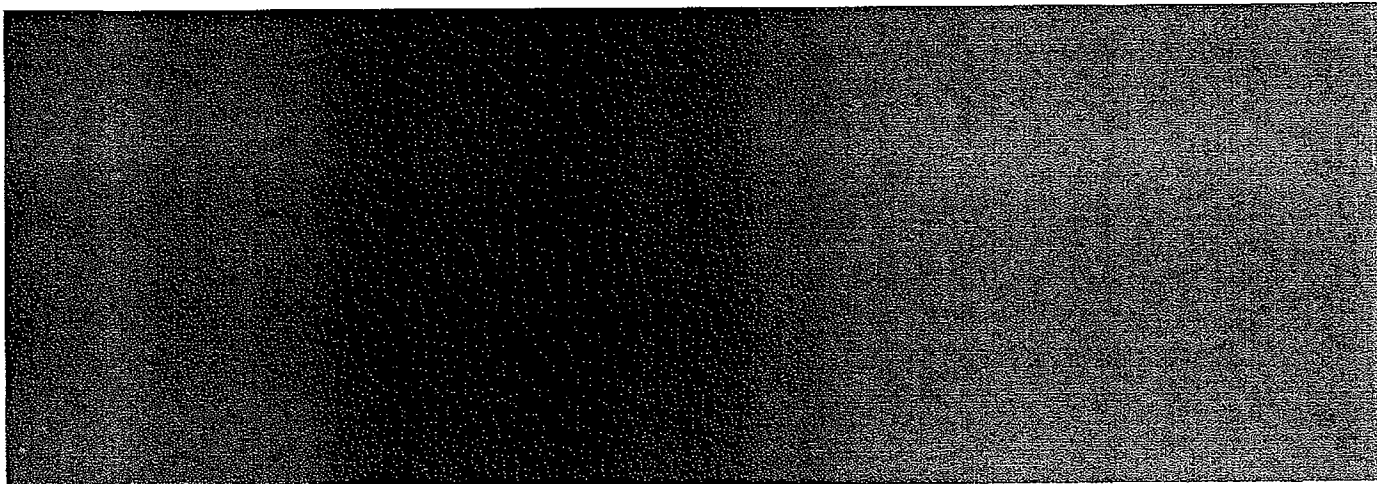












---

From: Ken Williams [mailto:KWilliams@HallEstill.com]  
Sent: Thursday, April 20, 2006 9:18 AM  
To: Stephen L. Jantzen; S McDaniel; J Elrod  
Cc: Michael Graves; Ken Williams  
Subject: Steve Butler, Green Country Farms, Tyson Poultry Grower - Subpoena in Northern District Case

Gentlemen:

We have been contacted by Steve Butler of Green Country Farms, a Tyson poultry grower and a member of Poultry Partners, who has asked us to coordinate with Tyson's counsel in responding to the attached subpoenas.

Steve, please give me a call when you have a chance so that we can confer.

Thanks!

Ken

---

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Thank you.

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02/21/2005 15:15 4797525678

PETERSON FARMS

PAGE 01

# Fax

To: *Archie Shaffer*

Organization:

From: *James Willerson*

Date:

Pages:

*2*

Comments:

02/21/2005 16:15 4797525678

PETERSON FARMS

PAGE 02

## Minutes of the Poultry Partners Meeting February 17, 2005

### Attending:

Julian Fite	Cherokee Nation - Chief Counsel
John Parris	Cherokee Nation - Asst. Chief Counsel
James Smith	Simmons - Director of Live Operations
Sam LeNarz	Peterson - Director of Live Operations
Randy Allen	Peterson Farms - Grower
Gene Allen	Peterson Farms - Grower
Steve Bryant	Tyson - Grower
Bev Saunders	Peterson - Grower
Larry Cruzan	Simmons - Grower

Introductions were made. John Parris then gave an overview of the Cherokee Nation's vision of working with the growers for two main purposes:

1. So the growers' voice can be heard in environmental issues
2. To help grower's obtain benefits

John stated that the interest of the Cherokee Nation comes from the fact that 300 of their tribal members are growers and that perhaps up to 5000 others work either directly or indirectly in the poultry industry. They have a vested interest in ensuring the industry prospers. He also said that this organization would not negotiate contracts between the growers and the industry. That issue is between the two parties.

Julian said that in the past the industry and the AG have talked without growers. Growers have not had a vehicle to have a voice and they need to be heard. He talked about that the Cherokee Nation would not be making decisions for the growers; that would be the responsibility of the growers in this proposed organization. The Cherokee Nation would help facilitate the growers establish a group and would provide the accounting and legal help needed. Their vision is that there would be a Board of Directors and elected officers.

The question was asked about funding. Janet explained that the companies were proposing to provide \$50,000 initially with the stipulation that \$75,000 would be raised from other poultry partners, IE, banks, insurance companies, equipment dealers. When the \$75,000 was raised, the industry would add another \$25,000.

The Cherokee Nation would like to have a planning meeting in the next 2 to 3 weeks to make arrangements for a large group meeting for the growers. John stated that he would like to send invitations that would include a letter from the industry, a letter from the Cherokee Nation and one from the Attorney General, each in support of the growers. He asked if the companies would be willing to send the invitations to each of their growers. The representatives of the companies in attendance agreed to that suggestion for their companies.

The meeting was adjourned.

Schaffer, Archie

From: Bev Saunders [sscattle2@yahoo.com]  
Sent: Wednesday, March 01, 2006 2:33 PM  
To: archie.schaffer@tyson.com; wilkersonj@petersonfarms.com; mcsimmons@simfoods.com  
Subject: Membership recruitment draft letter  
Attachments: 2183374033-draft letter vendors.doc; 1597320299-Draft letter growers.doc

**Draft letter to growers**

Poultry Partners is planning its annual membership drive. Please see the attached draft letter to growers. We would ask that each company distribute the letter to its growers. Please review the draft and advise if you are comfortable with it. If accepted, I will then reformat it and supply each of you with a master copy, if that is acceptable to you. If you need me to get the letters printed for you, please advise. Also, please let me know the names you want on the bottom of the letters and the official company titles. We feel its important for the growers to know you support Poultry Partners.

**Draft letter vendors**

Also, please review the draft letter to vendors. Advise if you would be willing to collectively sign one letter or if you'd prefer to put one company representative's name on the letters. Also, please advise if you'd be willing to help distribute these letters to vendors.

Please know how much I appreciate everyone's help. I know you are all very busy folks. Poultry Partners appreciates any and all support you give to our organization.

Bev

Yahoo! Mail  
Bring photos to life! [New PhotoMail](#) makes sharing a breeze.

Let me know if our being  
this same thing gives you  
any heartburn.  
Grower piece at least.  
Not sure about Vendors.  
— Archie...

3/16/2006

March 2, 2006

Dear Poultry Vendor,

You can make a difference... we need your help.

Poultry Partners, Inc., serves farmers in the states of Oklahoma, Arkansas and Missouri. The organization's mission statement says "We are a grassroots coalition of family farmers whose mission statement is to band together to ensure survival of the family farm and our rural communities." Poultry Partners, Inc., was first incorporated one year ago. This past year, the group has:

- ☐ Recruited membership to more than 400 family farms
- ☐ Published many personal letters, quarterly newsletters and a website to communicate to its members
- ☐ Raised money for both the general and legal funds to promote and protect family farmers
- ☐ Told our story of the American family poultry farmer to many civic groups and Chamber of Commerce organizations
- ☐ Spoke to elected legislators, both on the state and federal levels about the challenges and potential outcome of the Oklahoma Attorney General's lawsuit against the industry as well as other poultry industry issues
- ☐ Opposed extensive testing proposed by Oklahoma officials that violate the rights of the farmers

Poultry Partners, Inc., needs funding. The group is asking businesses that are supported by the family farmers and the poultry companies to contribute money to the legal fund, general fund or both.

Money donated to the general fund will be used to pay mailing costs, website costs, printing, phone bills, office supplies, travel expenses and the manager's payroll. Money designated for the legal fund will be used only for that expense.

To make a donation, please select from the status levels below and send your contributions to Poultry Partners, Inc., PO Box 220, Colcord, Okla. 74338. The Federal ID number you will need is 20-2603953.

The status levels are as follows:

- Bronze - \$100
- Silver - \$1,000
- Gold - \$5,000
- Platinum - \$10,000 and up.



Sponsors will be listed with names, addresses and phone numbers in the 2006 quarterly newsletters (unless the sponsors requests the donation be kept confidential).

We ask you to please support Poultry Partners, Inc., an organization that is working very hard to support you.

Sincerely,

Mark Simmons  
Simmons Foods Chief Executive Officer

Jerry Hunton  
Poultry Partners, Inc., Director and Simmons Grower

---

**From:** Burr, Jamie (Environmental)  
**Sent:** Thursday, October 27, 2005 5:18 PM  
**To:** Schaffer, Archie; Patrick, Steve; Igli, Kevin  
**Subject:** Poultry Partners Meeting

Gentlemen:

I attended the Poultry Partners meeting this morning. Those in attendance were:

Janet Wilkerson  
 Janie Hipp  
 Bed Saunders  
 Mark Simmons  
 Keith Morgan  
 Randy Allen  
 Peterson's attorney (Scott ?)  
 Annett Pagan (Winrock)

There were three main topics of discussion.

- 1) Winrock is going to seek funding (grants) to help Poultry Partners. By help I mean to be a consultant on how they can organize their group, build a business plan, find ways to "stack" private, state, and federal monies, find money to haul litter, find money for alternative uses, etc. Immediately, Winrock is going to apply for a Rural Entrepreneurs grant, which will be funneled through the City of Decatur (Winrock stated that small towns get more "points" towards being awarded this grant). Winrock really wants to help out and are going to work to find money to help out.
  - 2) The group came up with the idea of having an "Arkansas - Oklahoma Agricultural Summit." If they could find the spot they would love to pitch a huge tent right on the state line. Some of the ideas tossed around were to invite all agricultural interest groups (Farm Bureau, Farmers Union, NCC, NPB, NPPC, Cattlemens, etc) and have a summit in which all environmental agency heads (both states), all legislators (both states), growers, integrators, interest groups, etc would come together. They are considering asking Farm Bureau to lead the initiative. The focus would be to find solutions to the challenges facing the entire agriculture industry, trying to resolve issues outside of the courts, and sustainable agriculture. We will be hearing more on this in the near future from the group. They would like everyone to send Janie Hipp some agenda ideas.
  - 3) Poultry Partners would like help from the integrators in obtaining more members. Specifically, they would like for another round of letters to be sent out by the integrators. While discussing this, one of the Poultry Partners Board Members stated that they would like the integrators to help out more financially. I think that Peterson's Attorney answered him very well, in that he said that the integrators would not just write a blank check, that we needed to see a business plan, goals, budget, and some deliverables before any checks would be written. I need to spend some time with you guys understanding better "who, what, when, where, and how" we interact with this group.
- Archie, Annett Pagan wanted me make sure I told you that she is working with Soil and Water, NRCS, and Game and Fish on a CREP (Conservation Reserve Enhancement Program) proposal. They are having a meeting on November 7th. This program would provide 10-15 year contracts, yearly rental payments, cost share, and Signing Incentive for riparian buffers in the Nutrient Surplus Areas. I have a hand out that Annett had if you would like to see it.

1

A-21

TSN113694SOK

Archie and Kevin, Annett requested that we give her some time to find matching money for the \$500,000 that has been committed for the Illinois River Riparian Project on the Arkansas side of the line before it is awarded. I am sure that Janet Wilkerson will be talking to you about this.

If you have any questions or need clarification, please let me know.

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

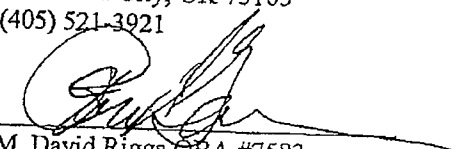
STATE OF OKLAHOMA, )  
 )  
 Plaintiff, )  
 )  
 v. ) Case No. 4:05-cv-00329-GKF-SAJ  
 )  
 TYSON FOODS, INC., *et al.*, )  
 )  
 Defendants. )

AMENDED NOTICE OF DEPOSITION OF PETERSON FARMS, INC.

Please take notice that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the deposition of Peterson Farms, Inc. (hereinafter "Peterson Farms"), by and through its duly designated representative(s), shall be taken by the State at 9:00 o'clock A.M. on July 26, 2007, at the offices of A. Scott McDaniel, McDaniel, Hixon, Longwell & Acord, PLLC, 320 S. Boston Ave., Suite 700, Tulsa, Ok 74103, before a qualified court reporter and videographer, such examination to continue by adjournment, if necessary, until the same is completed on those matters set forth in the attached Exhibit "A":

Respectfully Submitted,

W.A. Drew Edmondson OBA # 2628  
Attorney General  
Kelly H. Burch OBA #17067  
J. Trevor Hammons OBA #20234  
Tina Lynn Izadi OBA #17978  
Assistant Attorneys General  
State of Oklahoma  
313 N.E. 21<sup>st</sup> St.  
Oklahoma City, OK 73105  
(405) 521-3921

  
M. David Riggs OBA #7583  
Joseph P. Lennart OBA #5371  
Richard T. Garren OBA #3253



Douglas A. Wilson OBA #13128  
Sharon K. Weaver OBA #19010  
Robert A. Nance OBA #6581  
D. Sharon Gentry OBA #15641  
Riggs, Abney, Neal, Turpen,  
Orbison & Lewis  
502 West Sixth Street  
Tulsa, OK 74119  
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James Randall Miller, OBA #6214  
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Attorneys for the State of Oklahoma

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of July, 2007, I electronically transmitted the above and foregoing pleading to the Clerk of the Court using the ECF System for filing and a transmittal of a Notice of Electronic Filing to the following ECF registrants:

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Also on this 16<sup>th</sup> day of July, 2007 I mailed a copy of the above and foregoing pleading to:

**Robin S Conrad**

National Chamber Litigation Center  
1615 H ST NW  
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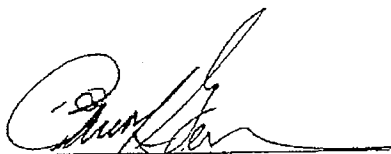
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Richard T. Garren

**RULE 30(B)(6) Notice – EXHIBIT “A”**

**I. Definitions**

1. “You” or “your” means Peterson Farms, Inc. and includes any parent, holding company, sister corporation, subsidiary, partnership, joint venture, association, owned by or which Peterson Farms, Inc. has an interest.
2. “Your poultry growing operations” means any poultry growing facility where birds owned by you are being produced or grown.
3. “The period of inquiry” shall be from the date you commenced any poultry growing operations located within the boundaries of the IRW to the date of your testimony unless stated otherwise.
4. As used herein “poultry waste” means poultry excrement, bedding material, feed wastes and any other waste associated with the confinement of poultry in a grow house which is removed periodically from the grow house and used or disposed of elsewhere, also commonly referred to by the Poultry Integrator Defendants as poultry litter.

**II. Areas of Inquiry**

1. The Contracts, its terms and conditions, between you and poultry growers located in the Illinois River Watershed (“IRW”), past and present, including the contracts themselves and any amendments or changes to the contracts considered, proposed or adopted.

2. The relationship between you and persons / entities owning or operating poultry growing operations under contract with you within the IRW.
3. The ingredients and composition of feed formulas, past and present, used at your poultry growing operations within the IRW.
4. The additives or supplements to feed formulas, past and present, used at your poultry growing operations within the IRW.
5. The hormones added to feed formulas, past and present, used at your poultry growing operations within the IRW.
6. The number, size and location of poultry houses / barns, past and present, at your poultry growing operations within the IRW.
7. The number of and kind of birds raised in the IRW each year by you or poultry growers under contract with you.
8. The amount of feed used at each and all of your poultry growing operations within the IRW on an annual basis.
9. The identity of the composition and constituents of poultry waste generally, and of poultry waste generated at your poultry growing operations within the IRW specifically, past and present, as well as any studies, analyses, testing, investigations or research of the composition or constituents of poultry waste.
10. The amount of poultry waste generated during the lifetime of an individual bird specified by bird types owned by you within the IRW.
11. The amount of poultry waste generated by each and all of your poultry growing operations within the IRW on an annual basis.

12. Industry practice and your contract poultry growers practice regarding handling, storage, and spreading on land of poultry waste.

13. The amount of and specific locations, past and present, where poultry waste generated by each and all of your poultry growing operations has been spread on land within the IRW.

14. Knowledge or awareness of the run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste generated by your poultry growing operations within the IRW has been stored, spread on or disposed of.

15. Knowledge or awareness of the run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste has been stored, spread or upon or disposed of.

16. The environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations within the IRW on which poultry waste generated by your poultry growing operations has been stored, spread on or disposed of.

17. The environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste has been stored, spread on or disposed of.

18. The efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations within the



IRW on which poultry waste generated by your poultry growing operations has been stored, spread on or disposed of.

19. The efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste has been stored, spread on or disposed of.

20. Practices, policies and procedures, past and present, pertaining to the management, handling, storage, transportation, sale, trading, spreading on land, disposition, and disposal of poultry waste generated by your poultry growing operations in the IRW.

21. The location(s) where poultry waste (or any constituents thereof) generated by your poultry growing operations that has run-off / been discharged / been released from land within the IRW has come to be located.

22. Best management practices for the handling, storage, transport, use or disposal of poultry waste generally and in the IRW specifically and the effectiveness of best management practices in preventing runoff / discharge / or release of poultry waste or the constituents of those into the waters of the IRW.

23. Actions (including but not limited to disciplinary actions) you have taken or contemplated taking against any of your poultry growers within the IRW pertaining to the handling, storage, transport, use, spreading on land, or disposal of poultry waste.

24. Alternative methods for the use or disposal of poultry waste.

25. The management, supervision, inspection and monitoring by you of persons / entities owning or operating poultry growing operations under contract with you.

26. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with the State of Oklahoma, any political subdivision of the State of Oklahoma, the State of Arkansas, any political subdivision of the State of Arkansas, and the United States (including but not limited to any of their respective elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

27. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with any university or college in the State of Oklahoma or the State of Arkansas (including but not limited to any of its officers, employees or departments).

28. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with the Farm Bureau, the Poultry Community Council, Poultry Partners, BMP's Inc., the Poultry Federation, the United States Poultry and Egg Association, the National Chicken Council and the National Turkey Federation (including but not limited to any of their respective officers, employees or agents).

29. Participation in and contributions and payments (financial or otherwise) to the Poultry Community Council, Poultry Partners, BMP's Inc., the Poultry Federation, the United States Poultry and Egg Association, the National Chicken Council and the National Turkey Federation (including but not limited to any of their respective officers, employees or agents).

30. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with any poultry growers in the IRW.

31. Manner and methods used to modify any procedures used by you or those contracted with you regarding the handling, storage and use of poultry waste of as a result of the settlement reached in the case of *City of Tulsa vs. Tyson Foods, Inc., et al.* USDC for the Northern District of Oklahoma; case no. CV 0900 EA(C).

32. The allegations made in paragraph 3 of the Third Party Complaint [DKT. #80].

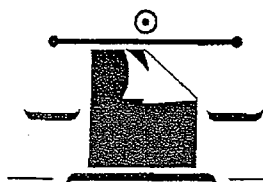
33. Advertising or public relations campaigns to which you have contributed or for which you have paid, directly or indirectly, in whole or in part, that address the environmental impact of poultry growing or poultry waste in the IRW.

34. Differences in the method, manner, direction or management of your poultry growing operations in Oklahoma compared to Arkansas within the IRW.

35. The facts, reason and basis supporting or relied on by you for responses made to the State's Requests for Admissions served on or about April 20, 2007.

36. Your corporate organizational structure including without limitation:

- a. identification of officers, directors and shareholders;
- b. any relationship with any parent, holding company or subsidiary;
- c. any relationship in or to any LLC, limited partnership, joint venture or association.
- d. Identification of any other areas of corporate business or operation conducted by you in addition to your growing, processing and marketing of poultry and poultry products.



McDANIEL,  
HIXON,  
LONGWELL &  
ACORD, PLLC  
ATTORNEYS AND COUNSELORS

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Tulsa, Oklahoma 74103  
Telephone: (918) 382-9200  
Facsimile: (918) 382-9282

July 18, 2007

*(Via Facsimile and E-Mail)*

Richard T. Garren  
Riggs, Abney, Neal, Turpen,  
Orbinson & Lewis  
502 West 6<sup>th</sup> Street  
Tulsa, Oklahoma 74119-1010

Re: *State of Oklahoma v. Tyson Foods, Inc., et al.*  
05-CV-0329-GKF-SAJ, U.S. District Court, Northern District  
**Objections to Rule 30(b)(6) Notice for Deposition**

Dear Mr. Garren:

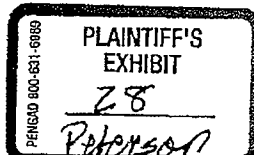
This correspondence sets forth the objections of Peterson Farms, Inc. ("Peterson") to the Amended Notice of Deposition served on July 16, 2007. Specifically, Peterson submits the following objections to plaintiff's Exhibit "A" to the Notice.

A. Definitions

1. Peterson objects to the definition of "you" and "your" as this definition seeks to expand the obligation of Peterson's corporate designee(s) to offer binding testimony on behalf of entities other than the separate defendant, Peterson Farms, Inc. Peterson's designee(s) will appear solely to testify on behalf of Peterson, and no other entity.

2. Peterson objects to the definition of "your poultry growing operations" as suggesting or inferring a relationship between Peterson and its contract growers as something other than as independent contractors. We are well aware of plaintiff's litigation position, and plaintiff is aware of Peterson's. Accordingly, Peterson will not accept or adopt plaintiff's definitions that are argumentative or assume facts not in evidence.

3. Peterson objects to "the period of inquiry" as unreasonably burdensome, particularly in light of plaintiff's failure to establish that



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information from such a broad time frame has any probative value to plaintiff's claims of present injury. As explained to you on multiple occasions, Peterson did not track the locations of the contract growers' farms with regard to specific watersheds until a few years ago. Accordingly, specific information regarding former growers' operations in the IRW is difficult to ascertain. Peterson will undertake reasonable efforts to prepare for the subject deposition; however, it does not intend to undertake an expensive and difficult research project in order to comply with plaintiff's Notice.

4. Peterson objects to plaintiff's definition of "poultry waste" as vague, overly broad and argumentative. Peterson does not object to the term "poultry litter."

5. The foregoing objections to plaintiff's terminology serve as continuing objections to each of plaintiff's areas of inquiry wherein the terms are utilized.

B. Areas of Inquiry

1. Peterson objects to Topic 1 on the basis that it is not limited in time, and incorporates its objection to the overly broad "period of inquiry" set forth above.

2. Peterson objects to Topics 3 through 5 as they are overly broad and burdensome. As expressed to you in Peterson's prior discovery responses, Peterson does not track the poultry feed it produces by watershed. Peterson also objects to the unlimited time frame of this topic. Peterson will make reasonable efforts to be prepared to testify about its poultry feed; however, it will not undertake an unreasonable and expensive research project in order to comply with the Notice.

3. Peterson objects to Topic 6 as overly broad and burdensome as it is unlimited in time, and incorporates its objection to the "period of inquiry" set forth above. Peterson has provided this information to plaintiffs pursuant to its prior discovery requests, and although Peterson will undertake reasonable efforts to prepare for the deposition, it is not feasible for any corporate designee to be equipped to testify about each and every contract farm within the IRW.

4. Peterson objects to Topics 7 and 8 on the same basis as the objections stated above with regard to the unlimited time frame, and the fact that the Topics seek information categorized in a manner in which it is not kept, *ie.*,

July 18, 2007  
Page 3

by watershed. Peterson has provided plaintiff with grower files, and placement and kill schedules from which plaintiff can discern these numbers for itself. Peterson will undertake reasonable efforts to prepare for the deposition; however, it is not feasible for any corporate designee to be equipped to testify about the production and feed consumption at each and every contract farm within the IRW.

5. Peterson objects to Topics 9 through 13 as overly broad and burdensome due to its unlimited time scope, and incorporates its objection to the "period of inquiry" set forth above.

6. Peterson objects to Topics 14 through 19, and 21 through 22 as overly broad and burdensome due to its unlimited time scope, and incorporates its objection to the "period of inquiry" set forth above. Peterson also objects to these Topics as it did when it responded to plaintiff's written discovery framed in the same manner. Plaintiff's use of the terms "run-off/dischARGE/release" is overly broad and vague, and fails to distinguish between the acts of nature or the volitional acts of man. It is also unclear what these terms mean in the spatial sense, i.e., at what point can substance or occurrence be classified as run-off, a discharge, or a release?

7. Peterson objects to Topics 20, 23 and 25 as overly broad and burdensome due to its unlimited time scope, and incorporates its objection to the "period of inquiry" set forth above.

8. Peterson objects to Topics 28 and 29 as they are not limited in time or to matters relevant to the claims or defenses in the lawsuit. Peterson also objects to responding to any inquiries with regard to the Poultry Community Council and Poultry Partners to the extent such inquiries seek to invade the attorney-client communication or common interest privileges, or the attorney work product doctrine. Furthermore, Ken Williams has advised all parties that his client is asserting the position that information related to the donors to Poultry Partners is confidential business information. Peterson intends to honor Poultry Partners' position.

9. Peterson objects to Topic 31 as the Court has deemed matters associated with the *City of Tulsa* case and the Eucha/Spavinaw Watershed as outside the scope of discovery in this case.

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Page 4

10. Peterson objects to Topic 33 to the extent any inquiry invades the attorney-client communication or common interest privileges, or the attorney work product doctrine.

11. Peterson objects to Topic 36 to the extent any inquiry solicits confidential and/or proprietary business information, which is not relevant to any claim or defense in the lawsuit.

Should you wish to discuss these objections prior to the deposition, or if you wish to modify any of the areas of inquiry to address these objections, please feel free to contact me.

Best regards,

MCDANIEL, HIXON, LONGWELL & ACORD, PLLC

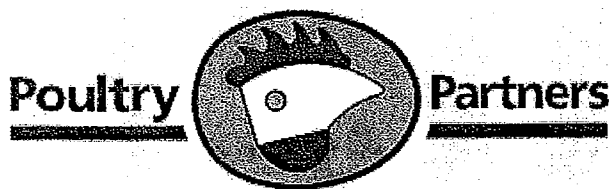


A. Scott McDaniel

ASM:jlw

cc: Counsel of Record (*via e-mail*)





# About Poultry Partners

## Mission Statement

We are a grassroots coalition of family farmers whose mission is to band together to ensure survival of the family farm and our rural communities.

## Goals & Objectives

- Ensure our membership has a meaningful place at the table in ongoing litigation and regulatory actions and in important developing public issues
- Provide an educational forum to our membership
  - Establish systems that will enable the membership to stay in contact and continually grow with the goal of perpetuating and strengthen educational and communications efforts
  - Develop a quarterly newsletter supplemented as needed with communications to members and friends of PPI
  - Establish a speakers bureau comprised of willing and capable PPI representatives who are able to carry the organization's message into communities by presenting prepared programs, speaking points and audio visual information
  - Utilize all available resources, including support from companies, to execute a membership campaign that will be comprehensive in nature
  - Conduct annual meetings for all PPI members and guests and other periodic (such as quarterly) meetings as necessary or desired
- Provide communication among our membership and between our membership and others
  - Proactively communicate positive information about our industries and farming to the news media and the population at large
  - Develop strategic, issue-specific communication messages on topics such as environmental stewardship, economic impact of agriculture, food safety and animal health and welfare
  - Place mass media print, television and radio campaigns in the region and beyond
  - Develop and distribute "good news" press release, feature stories, and fact sheets about the family farmer and positive activities of the poultry industry and agriculture
  - Develop a PPI website that will carry our message and make positive, factual information about our industry available to all audiences
- Provide accurate information to the public
  - Provide timely and credible responses to negative allegations against our industry
  - Monitor regional news coverage on key issues and issue statements, news releases and other appropriate responses
  - Identify PPI spokesperson(s) and provide him/her with media training and approved message points on key issues
  - Position PPI spokesperson(s) with media as an endorsed, easily accessible expert on PPI

issues

- Identify services or products to provide our membership
  - Group medical or other types of insurance
  - Group purchasing of inputs
  - Cooperative associations
- Foster better relationships between producers and the companies for which they produce agricultural products

## **Board Members**

**Jerry Hunton**, President  
479-824-5254

**Steve Bryan**, Director  
918-788-3896, 479-721-5454

**Randy Allen**, Vice President  
918-253-4385

**Tom McCain**, Director  
580-286-5737

**Brent Bolin**, Director  
580-208-6002

**Brian Wilkins**, Director

**Bev Saunders**, Manager  
918-326-0325

bev.saunders@poultrypartners.com



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About Tyson

Giving Thanks at Mealtime

## Company Information

## Growers

For almost 6,500 chicken growers and more than 250 live swine growers, a contract relationship with Tyson Foods is a means to a stable source of farm income. In this relationship, Tyson supplies the animals and the feed, and the grower provides the labor, facilities, and utilities.



For many, contract growing is a way to supplement the family economy with a second income. For some, it's a way to add balance and stability to other farming ventures that might carry more risk. For all, it's a way to maintain their family farm operations while minimizing the risks of the marketplace.

## From our growers:

*"This is the best job I've ever had, and I've had some good jobs. I don't know about other chicken companies, but Tyson provides all the information and help that you could ask for. Day or night, if there's a problem, they have someone who will help you."* — Heather Fairchild. Tyson Grower. Polk County, Arkansas.

*"I make it work. I work hard at it, and I'm passionate about it. I'm happy with my contract. I will continue to grow chickens, and if I can, I will expand it."* — Tom McCain. Tyson Grower. Idabel, Oklahoma.

- > Growers — FAQ
- > Growers — Complexes

## Explore the About Tyson Area

Step #1 ☒ Company Information

- ☐ Tyson Cares
- ☐ Products
- ☐ Live Production
- ☐ Locations
- ☐ History

Step #2 ☐ Growers

## Related Links

- > Growers Home
- > Growers FAQ
- > Grower Complexes

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# REVIEW OF FEDERAL FARM POLICY

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HEARINGS  
BEFORE THE  
SUBCOMMITTEE ON  
LIVESTOCK AND HORTICULTURE  
OF THE  
COMMITTEE ON AGRICULTURE  
HOUSE OF REPRESENTATIVES  
ONE HUNDRED NINTH CONGRESS  
SECOND SESSION

JULY 31, 2006, SIOUX CENTER, IA  
AUGUST 28, 2006 SPRINGFIELD, MO  
SEPTEMBER 26, 2006

Serial No. 109-37



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Class 1 milk needs to be floored at \$13 a hundredweight so we can assure consumers that they have a local supply of fresh milk.

We need Congress to appropriate some money for drought relief and a continuation of MILC as long as we remove the caps.

So in closing, Chairman Hayes, we appreciate you being here and we very much thank you for bringing your panel to southwest Missouri. Thank you.

[The prepared statement of Mr. Mooney appears at the conclusion of the hearing.]

Mr. HAYES. Thank you, Mr. Mooney.

And our next panelist is Mr. Jerry Hunton, poultry and cattle producer from Fayetteville, Arkansas.

**STATEMENT OF JERRY HUNTON, POULTRY AND CATTLE  
PRODUCER, FAYETTEVILLE, AR**

Mr. HUNTON. Thank you, Mr. Chairman, ladies and gentlemen. I would like to thank this committee for their work and taking time to listen to issues we see as extremely important.

As county judge of Washington County, I would like to bring to your attention that poultry is accountable for approximately 12 percent of our economy. A negative impact on poultry would affect our entire northwest Arkansas economy and everyone living in our area.

I am also a poultry farmer. As we continue to attempt to farm in an environment not friendly to agriculture, we are finding it increasingly difficult to earn a living and pay our mortgages and operating expenses. There was a time years ago when the average citizen understood a great deal about agriculture. This is no longer the case.

In northwest Arkansas, we are seeing a huge influx of people coming to the area seeking work and investment opportunities. Washington and Benton Counties, once leading agricultural counties within the State, are quickly becoming municipal counties. As you would expect, this population increase brings with it diversity in race, income, skills, education and maybe most importantly, views of the environment. Unfortunately, these different views of the environment can lead to demands on farmers that are not based on science, time lines that cannot be met and possible benchmarks that are creating financial hardships leading many farmers to financial ruin. The Natural Resources Conservation Service, Conservation District and the Cooperative Extension Service are attempting to educate, permit and, in short, keep a lid on this clash of ideologies. These and other organizations on the front line must be adequately funded with the goal of educating 99 percent of Americans who seem to no longer understand or care where their food comes from.

I am farming the same ground my father and mother bought with money earned while building Liberty ships in California during World War II. They started dairy farming and raising poultry in 1946. We stopped the dairy in 1998. We now raise purebred Angus cattle and have 12 poultry houses. We raise poultry under contract with Simmons Foods located in Siloam Springs, Arkansas, which is in Benton County. We provide the houses, the labor, fuel, water, electricity and are responsible for the poultry litter.

# The Poultry Federation Newsletter

June/July 2007

Volume 1, Issue 4



*A bimonthly newsletter for the members of The Poultry Federation, a non-profit trade organization serving the states of Arkansas, Missouri, and Oklahoma.*



## From Marvin Childers, President

As we enter into the new fiscal year of 2007-08 for the Federation, I wish to express my appreciation to all the members for their support of our organization. It is obvious that our members understand the importance of our industry to the states we serve, the government of those states, and the people we serve. Without your membership, The Poultry Federation would not be able to provide the many services we offer. I want to say a special Thank You to the Board of Directors for allowing me the opportunity to serve as your President. As we prepare for the new fiscal year, I plan to call upon our membership to provide information, contacts and leadership as we strive to fulfill our mission of promoting and protecting the poultry industry. Please send us your thoughts, ideas and concerns so that we can make our organization one of the strongest voices in state government.

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## Highlights of the Year

The Federation stayed active in the Arkansas, Missouri, and Oklahoma legislative sessions working on bills on behalf of its members. Highlights of the legislative bills include tax cuts in diesel tax; electricity and natural gas for manufacturers; sur-

plus poultry litter removal incentives; clean energy development; alternative fuels development; and illegal immigration. The conference room at the Federation office in Arkansas stayed busy during the legislative session. Over 500 people used the conference room during this time.

Educational conferences were held throughout the year: Nutrition Conference, Processors' Workshop, Live Symposium, and Turkey Conference. The Federation participated in a Growers' Symposium sponsored by Poultry Partners. The 48th annual Poultry Festival was held in Little Rock, AR. Advance ticket packages sold out prior to the event and ticket sales improved from the previous year. Next year's festival was moved to Rogers, AR. The Allied Industries Committee held annual fund raisers for college scholarships such as the Chicken Kitchen at the Arkansas State Fair and Missouri State Fair, and the auction at the annual festival. The Federation worked with many outside agencies on various projects and programs such as the G.I.S. program. Other projects included: water quality standards, Illinois River watershed, surplus litter removal, and avian flu influenza preparedness including disease alert notifications.

Federation Bylaws and membership dues were updated and a new Board of Directors was elected. Marvin Childers, former Arkansas state representative, was named president of the Federation, after former TPF president, Morrill Harriman became chief-of-staff for Governor Beebe. Business development director, Paulette Binkley, was added to the staff and a bi-monthly newsletter for members and friends of the industry has been published. Membership numbers for the year: 23 chicken, turkey, and egg companies and 145 allied member companies.

## Poultry Federation Names Board Officers

Gary Murphy, president of poultry operations at Simmons Foods, was named chairman of the board of The Poultry Federation for 2007-08 during the 48th annual Poultry Festival held in Little Rock on June 9.

Jerry Moye, president of Cobb-Vantress, was named vice chairman of the board; Jon Roberts, general manager of Cargill Meat Solutions, was named treasurer; and Trent Goins, sales and government relations for O.K. Industries, was named secretary. Ken Primm, president of O.K. Farms is the past chairman of the board.

Other board members include: Donnie Peters, complex manager, Townsend's Arkansas; Patrick Pilkington, vice president live production operations, Tyson Foods, Inc.; and Mike McClure, complex manager, Pilgrim's Pride Corp.,

who was also re-elected to serve a 3-year term. Steve Bryan of Oklahoma is the grower representative and Amy Witte of Elanco Animal Health is the allied industries representative.

New board members include: Kevin McDaniel, complex manager, Pilgrim's Pride Corp; Steve Storm, vice president of operations, Cal-Maine Foods; Tim Scanlan, vice president operations, Butterball, LLC; Greg Spencer, senior vice president of poultry operations, Tyson Foods, Inc.; Todd Simmons, chief operating officer, Simmons Foods; Blake Evans, chief executive officer, Peterson Farms; Charles George, executive, George's Inc.; Craig Coberley, vice president AR/MO complex, George's Inc.; Mike Briggs, president, Willow Brook Foods, Inc.; and Harold Pledger, live operations manager, Wayne Farms.



## Meet Your 2007-2008 BOARD OF DIRECTORS

### Gary Murphy Chairman

Gary Murphy, president of poultry operations of Simmons Foods, Inc., has served in this position since 1997. Responsibilities include live production, processing, purchasing, engineering, environmental, and international/commodity sales. Simmons produces 2.9 million broilers per week and employs 4,500 employees. Facilities include two hatcheries, one feed mill, two slaughter plants, two de-boning facilities and one fully cooked operation. Murphy has also served as Simmons vice president/complex director in Southwest City, Missouri.

Murphy started in the poultry industry while he attended college at the University of Southern Mississippi in Hattiesburg, where he received a Bachelor of Science degree in Business Administration with a major in finance. Murphy is the new chairman of the Board for The Poultry Federation for the 2007-08 year. He most recently served as the general chairman for the 48th Annual Poultry Festival, as well as vice chairman of the Board. Murphy has served as a member on several community boards as well as industry federations including Missouri and Louisiana.

Murphy and his wife, Debbie of 35 years, have 2 children and 5 grandchildren.

### Ken Primm Past Chairman

Ken Primm, president of O.K. Farms, Inc. is a third generation poultry man with roots to the first contract producer arrangements in the United States. Primm received a Bachelor of Science degree in Agricultural Business from Southern Arkansas University in Monticello. Upon completing a 5-year term with a large U.S. integrator, he joined O. K. Farms, Inc. in 1987. In 1998, after working in the areas of hatcheries, breeders, broilers, live haul, feed milling, slaughter, and further processing, he became president of O. K. Farms, Inc. As president of a fully integrated poultry entity, he oversees all live production, processing and de-boning operations.

Primm has been active with The Poultry Federation and just finished serving as chairman of the Board of Directors. He currently serves on the Executive Committee as past chairman. He is also on the Board of Directors of First National Bank, Heavener, OK and a member of the Board of Trustees of Carl Albert State College Development Foundation. He is an active volunteer in many civic organizations and a member of the First Baptist Church in Greenwood, Arkansas. He and his wife Lisa have been married for 26 years. They have 2 daughters, Kenna and Candace.



### Jerry Moyer Vice Chairman

Jerry Moyer is president of Cobb-Vantress, Inc. Prior to this position, Moyer was senior vice president of operations for Cobb-Vantress, Inc. He was responsible for production, planning, sales and marketing of grandparent and parent stock for Cobb in the United States as well as its subsidiaries in Europe, Brazil, and the Philippines. Moyer was also responsible for overseeing the Laboratory Q.A., and I.T. departments for the company.

Previously, Moyer served as Cobb U.S. division general manager from 1999 to 2001. He served as director of technical service from 1993 to 1998 and began his career with Cobb in 1991 as technical service representative in southeast United States.

Before joining Cobb, Moyer spent sixteen years in integrated chicken production as live production manager for two U.S. integrators: Showell Farms of Maryland and Zacky Farms of California. His management responsibilities included breeders, hatcheries, broilers, and feedmills.

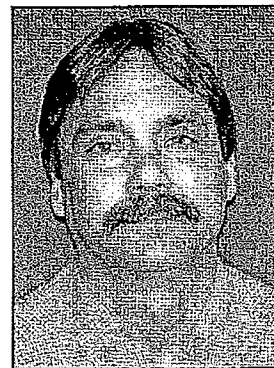
Jerry graduated with a degree in economics from Washington College in Maryland. He and his wife, Cherie reside in Rogers, Arkansas and have two children. Moyer serves as vice chairman of the Board of The Poultry Federation.

### Jon Roberts Treasurer

Jon Roberts is the general manager at Cargill Meat Solutions in California, Missouri. While working for Cargill the past 20 years he has lived in Delaware, Missouri, and Arkansas. Positions include feed mill manager, plant superintendent, processing plant manager, and general manager.

Roberts was born and raised in the corn/soybean country of Rossville, Illinois. He received a Bachelor of Science degree from Southern Illinois University. He is president of the California Youth Recreation Association and a board member of the California Progress Inc. Roberts currently serves as treasurer of the Board of Directors for The Poultry Federation.

Roberts and his wife Tammy have two daughters ages 14 and 9. He enjoys fishing, golf, and coaching youth sports.



### Trent Goins Secretary

Trent Goins works in sales and government relations at O.K. Industries, Inc. in Fort Smith. His responsibilities include customer relations, government policy, and retail sales.

Goins has a Bachelor of Arts Degree from the University of Arkansas in Fayetteville in Advertising and Public Relations. While attending college he was the president of the Associated Student Government and Phi Delta Theta fraternity.

Goins served as a legislative assistant in agriculture and trade for Congressman Marion Berry in Washington D.C. where he conducted research in agricultural policy, wrote agricultural policy, and was the liaison between Congressman Berry and the Ag Committee. He served as a summer intern under Senator Blanche Lincoln's office in Washington, D.C., where he researched policy, conducted capitol tours, and worked in customer relations. Goins is the newly elected secretary of the Board.

### Steve Bryan 2008

Steve Bryan is the grower representative on the Board of Directors. He is a farm owner in Blue Jacket, Oklahoma, and a grower for Tyson Foods, Inc. Bryan's family first entered into the poultry business when his grandfather added a small breeder egg operation to the family farm that was homesteaded in 1901, which was 6 years before Oklahoma became a state. In 1990, they placed poultry on the family farm. Currently the Bryans raise broilers, cattle, and Bermuda hay.

Bryan received a Bachelor of Arts degree from University of Central Oklahoma. In addition to being a farmer, he was a school teacher and taught art classes in West Plains, Missouri. He and his wife, Judy, have 2 sons, Jason and Greg. Jason Bryan lives on the farm and now runs the operation. Greg Bryan and his wife lives in Bentonville where he is a contractor and she is a dentist. The Bryans have 4 grandchildren, age 5 and under.